

**COMMISSION OF INQUIRY INTO THE DIAPHRAGM WALL AND PLATFORM
SLAB CONSTRUCTION WORKS AT THE HUNG HOM STATION EXTENSION
UNDER THE SHATIN TO CENTRAL LINK PROJECT**

**REPLY WITNESS STATEMENT OF WONG KAI WING, ANDY
FOR
MTR CORPORATION LIMITED**

I, **WONG KAI WING, ANDY**, of MTR Corporation Limited, MTR Headquarters Building, Telford Plaza, 33 Wai Yip Street, Kowloon Bay, Hong Kong, **WILL SAY AS FOLLOWS**

1. I am the same Andy Wong (AIOW) who gave a statement dated 12 September 2018 **[B1/B448-B463]**.
2. In this witness statement in reply, I shall address a few matters arising from the witness statements of Mr. Karl Speed and Mr. Edward Mok of Leighton.
3. I confirm that the contents of this statement are true to the best of my knowledge and belief. There are occasions when I can only speak to matters by reference to MTRCL's documents due to the lapse of time, in which case I believe the contents of those documents are true and correct.
4. At §61 of Mr. Karl Speed's 1st witness statement **[C11/C7612]** and at §37 of Mr. Edward Mok's 1st witness statement **[C12/C8115]**, it is said that I conducted a routine joint informal inspection with Mr. Edward Mok on 15 December 2015 and that during such inspection five defective steel bars were discovered. My recollection is that I did not conduct any joint informal inspection with Mr. Edward Mok. I have already set out my discovery of the defective steel bars on 15 December 2015 at §§17-29 of my witness statement dated 12 September 2018 **[B1/B452 - B454]**.
5. Mr Edward Mok's 1st witness statement §39 **[C12/C8116]** said that both MTRCL's "IOW" and Mr. Edward Mok personally supervised the rectification of the work which took around one or two hours and that both the "IOW" and Mr. Edward Mok attended the entire rectification process. I do not know whether Mr. Mok is referring to me as

the “IOW”, but so far as I can recall I only witnessed a part of the rectification works and did not stay for the entire rectification process. In this regard, I refer to §23 of my witness statement dated 12 September 2018 [B1/B453].

6. Further, I note that at various parts in Edward Mok’s 1st witness statement I was referred to as “IOW”. I would like to clarify that at all material times, I was the ALOW and Kobe Wong was the IOW.
7. Finally, I repeat the final paragraph of my witness statement dated 12 September 2018 [B1/B459-B460].

Dated 12 October 2018.



WONG KAI WING, ANDY

I certify that I, Lee Pui Ying Felicia, of Mayer Brown, 16-19/F, Prince’s Building, 10 Charter Road, Central, Hong Kong, have interpreted the contents of this witness statement to the person making this witness statement who appeared to understand the same and approved its content as accurate and made his signature in my presence.



Lee Pui Ying Felicia

Date: 12 October 2018